

ERIC SCHNEIDER 30(6)(B)
BARRETT vs GARAGE CARS, LLC.

June 10, 2024

1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3 CIVIL CASE NUMBER: 1:23-cv-11018-NMG

4 MICHAEL BARRETT, on behalf of
5 himself and all others similarly
6 situated,

7 Plaintiffs,

8 vs.

9 THE GARAGE CARS, LLC d/b/a
10 THE GARAGE,

11 Defendant.
12

13 VIDEOCONFERENCE 30(b)(6) DEPOSITION OF
14 GARAGE CARS, LLC,
15 BY AND THROUGH
16 ERIC SCHNEIDER

17 Monday, June 10, 2024
18 9:33 a.m.

19 Remote Proceeding
20 Cambridge, Massachusetts

21 Shayne Colomy
22 Digital Reporter
23 Commission No. 50205784
24

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APPEARANCES OF COUNSEL

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(There were no exhibits identified during
this proceeding.)

CERTIFIED QUESTION

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Q. Now, there is currently an entity named The
Garage selling cars in Massachusetts, correct?

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1 THE REPORTER: We are now on the record. The
2 time is 9:33 a.m. on June the 10th, 2024. We are here
3 to take the deposition of Eric Schneider in the case of
4 Michael Barrett v. The Garage Cars, LLC.

5 Good morning, everyone. My name is Shayne
6 Colomy, notary public and digital reporter for Esquire
7 Deposition Solutions in the state of New Jersey. I'll
8 be capturing the verbatim record of today's proceeding,
9 using electronic audio equipment, a computer, and
10 specialized recording software, which is not a form of
11 stenography.

12 The witness is located in Cambridge,
13 Massachusetts, and does not have the local authority
14 present to administer the oath to them.

15 In lieu of my administering the oath to this
16 witness, I would ask that all parties stipulate that
17 the witness has identified himself as Eric Schneider,
18 and that the witness' testimony will be treated as if
19 given under oath, and that the final transcript may be
20 used for all purposes allowed by the local Rules of
21 Civil Procedure.

22 Can you verbalize your agreement to this
23 stipulation by stating your name, your firm, and who
24 you represent in this matter.

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1 MR. ZELMAN: Yitzchak Zelman, for Marcus &
2 Zelman, representing the Plaintiff; so stipulated.

3 MR. LEBLANC: Eric LeBlanc from Bennett &
4 Belfort. I just want to make a clarification that we
5 are here for the 30(b)(6) deposition of Garage Cars,
6 LLC, not the individual deposition of Mr. Schneider,
7 and we so stipulate.

8 THE REPORTER: Understood. Thank you.
9 Counsel, this witness is yours.

10 MR. ZELMAN: Thank you.

11 EXAMINATION

12 BY MR. ZELMAN:

13 Q. Good morning. My name is Yitzchak Zelman, and
14 I represent the plaintiff, Michael Barrett, in this
15 action.

16 Can you please state your name for the record.

17 A. Eric Schneider.

18 MR. LEBLANC: And Yitzchak, can you please put
19 the stipulations on the record?

20 MR. ZELMAN: Sure. Just all objections are
21 reserved for the time of trial, except for form, right?
22 Other than that --

23 MR. LEBLANC: Motions to strike are reserved.

24 MR. ZELMAN: Motions to strike are reserved

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1 for time of trial, as well. Anything else?

2 MR. LEBLANC: Witness will be given 30 days to
3 read and sign.

4 MR. ZELMAN: Sure.

5 MR. LEBLANC: And to the extent required,
6 notary is waived.

7 MR. ZELMAN: Okay. Understood.

8 BY MR. ZELMAN:

9 Q. Mr. Schneider, you understand that you're
10 testifying here today on behalf of The Garage Cars,
11 LLC, doing business as The Garage?

12 A. Yes.

13 THE REPORTER: Apologies, Counsel. My
14 Internet just cut out for a bit. Could you just repeat
15 that last question?

16 BY MR. ZELMAN:

17 Q. Sure. Mr. Schneider, you understand you're
18 testifying here today on behalf of The Garage Cars,
19 LLC, doing business as The Garage?

20 A. Yes.

21 Q. All right. For purposes of today's
22 deposition, I'll just refer to that company as The
23 Garage. Is that all right with you?

24 A. Yes.

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1 Q. What is your role with that company?

2 MR. LEBLANC: Objection.

3 THE WITNESS: That company is no longer in
4 business.

5 BY MR. ZELMAN:

6 Q. Okay. What was your role with that company
7 when it was in business?

8 A. I was the president.

9 Q. Were you also the manager?

10 A. I believe so, yes.

11 Q. Okay. When did that company go out of
12 business?

13 A. In 2021, I believe, December of '21.

14 Q. Okay. And what business was that in?

15 A. I'm sorry?

16 Q. What business was The Garage in?

17 A. I -- I don't understand the question.

18 Q. The Garage, did it sell produce?

19 A. Oh, excuse me. It was an automobile
20 dealership.

21 Q. Okay. Thank you. Now, there is currently an
22 entity named The Garage selling cars in Massachusetts,
23 correct?

24 MR. LEBLANC: Objection. Outside the scope.

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1 You can ask about the -- the entity that's been sued.

2 MR. ZELMAN: I understand.

3 BY MR. ZELMAN:

4 Q. You can answer, Mr. Schneider.

5 MR. LEBLANC: No. I'm -- I'm instructing you
6 not to answer. That's outside the scope of your
7 30(b)(6).

8 MR. ZELMAN: I understand. The only time you
9 can instruct a witness not to answer a question is if
10 you're moving to limit or terminate the deposition
11 because I'm harassing or abusing the witness.

12 Is that what you're doing right now?

13 MR. LEBLANC: You are going outside the bounds
14 of your 30(b)(6) notice. The witness has nothing
15 prepared on that topic.

16 MR. ZELMAN: I understand. So he can testify
17 as to his personal knowledge. Again, there's very few
18 times under the FRCP you can instruct the witness not
19 to answer. If you are doing so now, we can get the
20 Court on the line.

21 Is that your intention?

22 MR. LEBLANC: We can certify this question.

23 And go ahead and answer the question,
24 Mr. Schneider.

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1 THE WITNESS: What is the question?

2 BY MR. ZELMAN:

3 Q. This question was simply this: There is an
4 entity named The Garage selling vehicles in
5 Massachusetts, as of today's date, correct?

6 MR. LEBLANC: Objection.

7 You can answer.

8 THE WITNESS: Yes.

9 BY MR. ZELMAN:

10 Q. And that's got two locations?

11 MR. LEBLANC: Objection.

12 You can answer.

13 THE WITNESS: Yes.

14 BY MR. ZELMAN:

15 Q. One location is in Brockton, one location is
16 in Whitman?

17 MR. LEBLANC: Objection.

18 You can answer.

19 THE WITNESS: Yes.

20 BY MR. ZELMAN:

21 Q. The location that we're going to be talking
22 about today, the dealership -- I'm sorry. Let me
23 rephrase.

24 The dealership that closed, that was located

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1 in -- where was it located? I'm sorry.

2 A. Bridgewater.

3 Q. I'm sorry. What -- what was the answer?

4 A. Bridgewater.

5 Q. Oh, Bridgewater. That -- correct. Was that
6 the third location of this entity?

7 MR. LEBLANC: Objection.

8 THE WITNESS: Yes.

9 BY MR. ZELMAN:

10 Q. Okay. Why did this location close?

11 A. Due to a lack of business.

12 Q. Are you also the president or manager of the
13 other two locations?

14 MR. LEBLANC: Objection.

15 You can answer.

16 THE WITNESS: I am.

17 BY MR. ZELMAN:

18 Q. Sorry if I missed this, did you say the
19 business -- this location closed at the end of 2021?

20 A. It was December of 2021.

21 Q. What happened to the cars that were at that
22 location?

23 MR. LEBLANC: Objection.

24 THE WITNESS: There were no longer any

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1 vehicles there at the end of the business.

2 BY MR. ZELMAN:

3 Q. Was it a matter of you sold every last one at
4 that location or did they move to another location?

5 A. From the best of my memory, I believe we sold
6 them.

7 Q. Okay. What did you do with all the records
8 relating to the vehicles sold from that dealership?

9 A. What do I do or what did I do?

10 Q. Well, what did you do?

11 A. We had them kept in folders.

12 Q. Do you still have them?

13 A. No, I do not.

14 Q. Who does?

15 A. They were thrown away by my ex-landlord.

16 Q. The landlord of the Bridgewater location?

17 A. Correct.

18 THE REPORTER: Sorry. One more time, Counsel.

19 MR. ZELMAN: I was just saying the landlord of
20 the Bridgewater location.

21 THE REPORTER: Thank you.

22 MR. LEBLANC: Did you get the answer,
23 Mr. Colomy?

24 THE REPORTER: I believe he said, "Yes."

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1 MR. LEBLANC: He said, "Correct."

2 THE REPORTER: Yeah. Oh, thank you.

3 BY MR. ZELMAN:

4 Q. What was your ex-landlord's name?

5 A. Thomas Cahill.

6 Q. Did you or anyone else at The Garage ask
7 Mr. Cahill to throw them away?

8 A. No.

9 Q. Why did he do that?

10 MR. LEBLANC: Objection.

11 You can answer.

12 THE WITNESS: Because I was no longer his
13 tenant, and he had already rented the place out to
14 somebody else and they were taking up space, he said.

15 BY MR. ZELMAN:

16 Q. Okay. Do you have any other records relating
17 to the vehicles sold out of that location?

18 A. I do not.

19 Q. Do you have any electronic backups?

20 A. No.

21 Q. Okay. In this case, we're going to be talking
22 about a vehicle that was sold to my client, Michael
23 Barrett.

24 You have documents relating to that sale,

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1 correct?

2 A. Yes.

3 Q. How is that?

4 A. I went to retrieve the record after I found --
5 after I received a Complaint, I went to retrieve those
6 records. That is when I found out that I needed the
7 folder.

8 Q. How did you retrieve those records?

9 A. I went to the last known location of the boxes
10 and I pulled the folder out.

11 Q. What was the last known location of the box?

12 A. In the office corner of where we used to lease
13 the -- lease the office.

14 Q. When did you do that?

15 A. After I received the Complaint.

16 Q. When you say "the Complaint," are you
17 referring to the Complaint that initiated this lawsuit?

18 A. Yes.

19 Q. Have you read the Complaint filed in this
20 lawsuit?

21 A. Yes.

22 Q. And the Complaint alleges claims on behalf of
23 Mr. Barrett and also on behalf of a class of similarly
24 situated individuals.

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1 Do you know what a class action is?

2 MR. LEBLANC: Objection.

3 To the extent that would implicate
4 attorney-client privilege, I would instruct you not to
5 answer. If you have independent knowledge of what a
6 class action lawsuit is, you may answer.

7 THE WITNESS: I do know.

8 BY MR. ZELMAN:

9 Q. Okay. And so when you received that Complaint
10 on behalf of Mr. Barrett, you understood that the case
11 was not just referring to the claims -- I'm sorry, the
12 sale of the vehicle to Mr. Barrett, but the sale of
13 vehicles to a number of The Garage's customers?

14 MR. LEBLANC: Objection.

15 THE WITNESS: I did not know.

16 BY MR. ZELMAN:

17 Q. You said you read the Complaint, though,
18 right?

19 A. I did.

20 Q. Okay. Did you read the section where the
21 Complaint states that, "Plaintiff therefore brings this
22 claim on behalf of himself and a class of similarly
23 situated consumers pursuant to Civil Rule 23"?

24 A. I did not read it thoroughly and understand

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1 that.

2 Q. When you retrieved the file for Mr. Barrett's
3 sale, why did you not retrieve the remaining records
4 you had in this location that you no longer were
5 occupying?

6 MR. LEBLANC: Objection.

7 You can answer.

8 THE WITNESS: I grabbed what I thought was
9 what I needed at that point in time and planned on
10 going back to take the rest at a more convenient time.

11 BY MR. ZELMAN:

12 Q. Okay. How soon after that were these boxes
13 thrown out by your ex-landlord?

14 MR. LEBLANC: Objection.

15 THE WITNESS: I'm not sure.

16 BY MR. ZELMAN:

17 Q. What is your ex-landlord's phone number?

18 A. I don't know.

19 Q. What is your ex-landlord's address?

20 A. I don't know.

21 Q. How long was your company a tenant of
22 Mr. Cahill?

23 A. I believe four or five years. I don't really
24 remember exactly.

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1 Q. And during that time, you would communicate
2 with Mr. Cahill when needed?

3 A. When needed.

4 Q. And you would do that by phone?

5 A. I -- I don't remember.

6 Q. Do you remember communicating by phone with
7 Mr. Cahill at any time?

8 A. I don't remember.

9 Q. Okay. Mr. Cahill was your landlord for four
10 or five years, but you don't have his phone number saved
11 in your -- in your phone?

12 A. I do not.

13 Q. What was the address of the Bridgewater
14 location?

15 A. I believe it was 4 -- 456 Bedford Street or
16 465 Bedford Street. I can't remember exactly.

17 Q. As a dealer in Massachusetts, are you aware
18 that you need to keep a title log of vehicles that come
19 in and it gets sold?

20 MR. LEBLANC: Objection.

21 To the extent that would come from counsel, I
22 would instruct you not to answer. To the extent you
23 have independent knowledge, you may answer.

24 THE WITNESS: I am.

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1 BY MR. ZELMAN:

2 Q. Okay. Do you still have that title log for
3 the Bridgewater location?

4 MR. LEBLANC: Objection.

5 THE WITNESS: No.

6 BY MR. ZELMAN:

7 Q. Where is it?

8 A. It was thrown away with the records.

9 Q. In this case, Mr. Schneider, we're trying to
10 identify the individuals who purchased vehicles from
11 The Garage in the four-year period leading up to the
12 filing of this lawsuit.

13 Do you have any way to identify those
14 individuals?

15 A. No.

16 Q. Can you identify some of those individuals?

17 A. No.

18 Q. Okay. Have you tried?

19 A. No.

20 Q. Why not?

21 MR. LEBLANC: Objection.

22 BY MR. ZELMAN:

23 Q. Mr. Schneider, you can answer.

24 A. I'm sorry. What is the question?

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1 Q. I asked why not.

2 MR. LEBLANC: Why haven't you tried to
3 identify those individuals?

4 THE WITNESS: I wouldn't know how.

5 BY MR. ZELMAN:

6 Q. Okay. Who is Lauren Silver?

7 THE REPORTER: I'm sorry. Could you repeat
8 that?

9 BY MR. ZELMAN:

10 Q. Who is Lauren Silver?

11 A. She was the salesperson.

12 Q. At the Bridgewater location?

13 A. Correct. Yes.

14 Q. Does she still work for any of the other
15 locations?

16 A. Yes.

17 Q. Okay. What location does she work at? Or
18 does she work just for the company in general?

19 MR. LEBLANC: Objection.

20 You can answer.

21 THE WITNESS: She works for the company.

22 BY MR. ZELMAN:

23 Q. What does she do?

24 A. She sells automobiles.

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1 Q. And she doesn't do that at a specific
2 location? She bounces around from location to
3 location? How does that work?

4 A. She works where she's needed.

5 Q. Is that the case for most of the employees of
6 The Garage? Do they go from location to location as
7 needed?

8 MR. LEBLANC: Objection.

9 THE WITNESS: At times.

10 BY MR. ZELMAN:

11 Q. When Bridgewater was opened, was that the same
12 arrangement; Lauren or the other employees would go
13 from location to location, including Bridgewater, as
14 needed?

15 A. No.

16 Q. How did that differ?

17 A. Business has changed.

18 Q. How so?

19 A. Things have gotten slower.

20 Q. Things have gotten slower now?

21 A. Yes.

22 Q. By that answer, I assume that back in 2020 or
23 2021, business was more active?

24 A. No.

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1 Q. Then what do you mean business got slower? I
2 thought I was making a logical conclusion there.

3 A. We don't need the same amount of people as we
4 did at one point in time.

5 Q. Okay. So when Lauren was working at the
6 Bridgewater location back in 2020 or 2021, was she just
7 working at the Bridgewater location at that time, or
8 was she also going between locations at that time?

9 A. She was in Bridgewater.

10 Q. As a president/manager, you would go between
11 the different locations?

12 A. No.

13 Q. Where would you be?

14 A. I worked virtual for a period of time during
15 COVID.

16 Q. So were you at all locations, but of none?

17 A. I -- I would -- I would go to each location as
18 needed, but I was not set in any one location permanent.

19 Q. I remember those times. A lot of us were
20 working at home, if possible. Was that the case for a
21 lot of The Garage employees?

22 A. Yes.

23 Q. So would a lot of them also work virtually at
24 the different locations as needed?

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1 MR. LEBLANC: Objection.

2 THE WITNESS: No.

3 BY MR. ZELMAN:

4 Q. Who would?

5 A. I don't remember.

6 Q. How many people does The Garage employ overall
7 roughly?

8 MR. LEBLANC: Objection. Before we go too
9 much further, when you're referring to The Garage,
10 you're referring to the entity that's been named as the
11 30(b)(6) deponent, right?

12 MR. ZELMAN: I guess let's -- let's clarify
13 this, if you will.

14 BY MR. ZELMAN:

15 Q. Mr. Schneider, is there one entity that is
16 sort of an umbrella organization or owns the different
17 locations?

18 MR. LEBLANC: Objection.

19 THE WITNESS: They were separate businesses.

20 BY MR. ZELMAN:

21 Q. I -- I understand that. But as -- are you the
22 owner of the business?

23 A. The business is now closed.

24 Q. The Bridgewater business is now closed. When

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1 you --

2 A. Right.

3 Q. When the Bridgewater business was open, were
4 you the owner?

5 A. Yes.

6 Q. And are you the owner of the Brockton and
7 Whitford [sic] businesses?

8 A. I am part owner.

9 Q. I -- I said Whitford. I meant Whitman. I'm
10 sorry.

11 Were you part owner of the Bridgewater?

12 A. I'm -- I'm a little confused with the
13 question.

14 Q. Sure. Okay. I think I left out a word at the
15 end there. Were you part owner of the Bridgewater
16 business or were you full owner of that one?

17 A. I was the owner.

18 Q. Okay. You were the only owner?

19 MR. LEBLANC: Objection.

20 THE WITNESS: Yes.

21 BY MR. ZELMAN:

22 Q. Okay. And the Brockton location and the
23 Whitman location, are those organized as separate
24 businesses or are they owned by one business?

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1 MR. LEBLANC: Objection.

2 THE WITNESS: They are separate businesses.

3 BY MR. ZELMAN:

4 Q. Okay. And is there a holding company or some
5 sort of company that owns these various businesses?

6 A. No.

7 Q. Okay. So going back to my questions from
8 earlier. We were talking about during COVID times that
9 you would work virtually at the different locations as
10 needed.

11 And my question was: Were there other
12 individuals who were also doing that?

13 A. Working from home?

14 Q. Working virtually.

15 A. I -- I don't remember.

16 Q. How many employees were employed by the
17 Bridgewater location?

18 A. One.

19 Q. Who is that?

20 A. Lauren Silver.

21 Q. Who's Chris Pires?

22 A. He would help out once in a while for the
23 location, driving some vehicles.

24 Q. Okay. Does he currently work at any of the

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1 other Garage locations?

2 A. As needed, he will drive vehicles for us, yes.

3 Q. Okay. Have you spoken with anyone in
4 preparation for today's deposition?

5 A. Yes.

6 Q. Who? Other than your attorney, which I don't
7 want to hear.

8 A. Nobody. Just my attorney.

9 Q. Have you reviewed any documents in preparation
10 for today's deposition?

11 A. Yes.

12 Q. What documents were those?

13 A. The answers to the deposing of the -- of your
14 client.

15 Q. Do you mean the deposition transcript of my
16 client?

17 A. Yes.

18 Q. Anything else?

19 A. My last answers to my interrogatory questions,
20 yes.

21 Q. All right. Anything else?

22 A. No.

23 Q. All right. Have you reviewed a copy of the
24 Complaint filed in this action?

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1 A. Yes.

2 Q. Anything else?

3 A. I don't think so. I don't remember anything
4 else.

5 Q. Have you ever reviewed a copy of the
6 deposition notice that is the reason why we're here
7 today?

8 A. If that was in -- I believe so, yes.

9 Q. Okay. Anything else?

10 A. I don't think so, no.

11 Q. What about the documents that the Plaintiff
12 produced in this action?

13 A. Yes, those were in there.

14 Q. What about the documents that the Defendant
15 produced in this action?

16 A. I believe I read those, yes.

17 Q. Okay. So when I asked if you reviewed any
18 documents and you say no, but then there's all these
19 documents that you have reviewed, I'm just trying to
20 make sure I have a full understanding of the documents
21 that you've reviewed.

22 Is there anything else that I haven't gone
23 over that you've looked at in preparation for today's
24 deposition?

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1 A. Not to my memory. Possible. I don't think
2 there's anything else that I reviewed, but.

3 Q. Have you spoken with Mrs. Silver -- or
4 Ms. Silver, I'm sorry, with regard to this case?

5 A. It -- it's possible I might have mentioned it
6 when it first came up. I believe so.

7 Q. What did you discuss with her?

8 A. I asked her if she remembered about the
9 particular client.

10 Q. What did she tell you?

11 A. That she did remember and that she was -- he
12 was a good negotiator.

13 Q. Anything else she remembered?

14 A. I don't remember.

15 Q. Okay. At a certain point -- well, let me ask
16 you like this, probably a little better. In this case,
17 The Garage produced a series of e-mails between
18 Ms. Silver and my client.

19 Did you see those?

20 A. Yes, I did.

21 Q. Did you ask her to put those together?

22 A. I did.

23 Q. When did she do that?

24 A. I don't recall the exact date, but it was

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1 after I received the Complaint.

2 Q. Okay. And at that time, Lauren was using the
3 e-mail, thegarageiii@comcast.net?

4 A. I don't know.

5 Q. Let me -- I -- I can share my screen, if that
6 would help.

7 A. I don't know her e-mail address.

8 Q. Sure. So let me just put this up on the
9 screen. Let me know when you can see it.

10 A. Yes.

11 Q. Do you see the documents on the screen in
12 front of you, Mr. Schneider?

13 A. Yes, I do.

14 Q. Okay. And these are Bates stamped by your
15 attorney. In the bottom right corner it says GAR 4
16 through 17.

17 Do you see that?

18 A. Yes.

19 Q. All right. And these documents are a series
20 of e-mails between my client and Lauren, The Garage
21 Bridgewater.

22 Do you see that?

23 A. Yes.

24 Q. All right. And the e-mail address is

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1 thegarageiii@comcast.net.

2 Do you see that?

3 A. Yes.

4 Q. Does that refresh your recollection of the
5 e-mail address that was used by Lauren at the
6 Bridgewater location?

7 A. No.

8 Q. Okay. But do you have any reason to doubt
9 that these e-mails are, in fact, Lauren's e-mails to my
10 client?

11 A. I don't know her e-mail address.

12 Q. I understand. At some point, you asked Lauren
13 for her e-mails with regards to my client, correct?

14 A. I did not ask her for her e-mails. She gave
15 me her e-mails.

16 Q. Okay. And these are the e-mails that she gave
17 you?

18 A. Yes.

19 Q. All right. Did you ask her for e-mails
20 relating to any of the other customers of The Garage
21 Bridgewater location?

22 MR. LEBLANC: Objection.

23 Wait. Wait. You can answer.

24 THE WITNESS: I have not.

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1 BY MR. ZELMAN:

2 Q. Okay. Now, have you read through these
3 e-mails, or do you want a moment for me to, like,
4 slowly scroll through them so you can read it?

5 A. You can read it.

6 Q. No, I -- I've read them. I'm saying, have you
7 seen this before? I don't need you to memorize it.

8 I'm just asking, have you, you know -- do you
9 generally know what they were discussing in these
10 e-mails?

11 A. I have an idea.

12 Q. Okay. Okay. So we can move along. There's
13 conversations in these e-mails about the lien on the
14 vehicle, or the plates, we're picking up the vehicle,
15 and the registration, stuff like that.

16 Is that your recollection?

17 A. Yes.

18 Q. All right. And Lauren would have these types
19 of conversations with other customers of the Bridgewater
20 location in order to sell them the vehicles that are
21 being sold by that location, correct?

22 MR. LEBLANC: Objection.

23 THE WITNESS: I don't know the conversations
24 that she had with other clients at any point in time.

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1 BY MR. ZELMAN:

2 Q. Sure. But selling a vehicle requires a bit
3 more work than say selling a blender, right? There's
4 registrations that need to be taken care of, plate
5 transfers, lien satisfactions, recording, stuff like
6 that.

7 Does that all sound like something you're
8 familiar with as being the manager and owner of The
9 Garage?

10 MR. LEBLANC: Objection.

11 You can answer.

12 THE WITNESS: Each deal is different.

13 BY MR. ZELMAN:

14 Q. But each deal involves a motor vehicle,
15 correct?

16 A. Yes.

17 Q. All right. And each motor vehicle needs to be
18 registered?

19 A. At some point.

20 Q. And they need a license plate?

21 A. Clients have been known to come in and have
22 their own plates with them.

23 Q. Do you need to do any sort of arrangements or
24 just tapering of the transfer to plates or anything

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1 like that?

2 A. Each -- each transaction is -- is tailored
3 differently for each client's needs.

4 Q. These aren't trick questions. What I'm trying
5 to drive at here is that it's -- it's common in the
6 motor vehicle transaction to have some of this back and
7 forth, like what Lauren was doing with Mr. Barrett in
8 terms of discussing liens, or plate transfers, or
9 registration and stuff like that?

10 MR. LEBLANC: Objection.

11 You can answer.

12 THE WITNESS: Each customer is different.

13 BY MR. ZELMAN:

14 Q. So you can say that it's a common thing to
15 have to deal with a registration of a vehicle upon
16 selling that vehicle?

17 A. We -- we generally discuss these things at
18 times throughout the deal. We know each customer's
19 need.

20 Q. Sure. Do you have access to the e-mail
21 address that we looked at a moment ago or does only
22 Lauren have that access?

23 A. I -- I don't know if she has access to it.

24 Q. Do you have access to it?

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1 A. I do not.

2 Q. Okay. I mean, but she still works for The
3 Garage, correct?

4 MR. LEBLANC: Objection. Again, let's --
5 let's be clear about -- about the language we're using.
6 BY MR. ZELMAN:

7 Q. Well, she works at the other two Garage
8 locations at this time, correct? That's your testimony
9 from earlier?

10 A. She worked for our Bridgewater location that
11 is currently closed. It's out of business.

12 Q. I understand. But you -- we asked earlier
13 about Ms. Silver, and you said she's still currently
14 working for the other Garage locations at this time,
15 correct?

16 A. She does do work for us. Yes, she does.

17 Q. What is her role? Or is she -- oh, actually,
18 I'm sorry. She's still the -- the salesperson, you
19 said?

20 A. Yes.

21 Q. Okay. And that's the same role she was
22 filling at the Bridgewater location?

23 A. Yes.

24 Q. All right. What is Lauren's phone number?

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1 MR. LEBLANC: Objection. I -- we're not going
2 to put that on the -- on a record.

3 MR. ZELMAN: Okay. We can take it off the
4 record.

5 THE WITNESS: Well, it's a private phone
6 number that I'd rather not give out, to be quite honest
7 with you, without her permission.

8 MR. ZELMAN: All right. Let me ask you like
9 this -- give me a moment. Maybe I can figure this out
10 with your counsel.

11 And Mr. LeBlanc, are -- are you representing
12 Ms. Silver as an employee of The Garage, or is this
13 someone, like, a witness that we should be contacting
14 outside of you?

15 MR. LEBLANC: Well, Ms. Silver is neither a
16 party nor currently employed by the entity that is at
17 issue. In addition, she has not -- her deposition
18 hasn't been noticed. So that being the case, I will
19 discuss with my client and take -- take an official
20 position after I talk with him.

21 MR. ZELMAN: Sure. Okay. So I was just
22 checking to see if you're currently representing her.
23 If she's not -- I mean, since it doesn't sound like
24 she's currently being represented by counsel,

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1 Mr. Schneider, I'll get that phone number.

2 And Shayne, we can do this one off the record.

3 MR. LEBLANC: We're -- we're not giving you
4 the phone number right now.

5 MR. ZELMAN: Okay. Let me just flag this so
6 during a break, we can call the Court.

7 MR. LEBLANC: I wouldn't call the Court --

8 MR. ZELMAN: What about --

9 MR. LEBLANC: I wouldn't call the Court.

10 Again, we have to conference this issue and I need to
11 talk to my client about what the ultimate decision will
12 be.

13 MR. ZELMAN: Okay.

14 MR. LEBLANC: So again, this is outside the --
15 outside the scope of the 30(b)(6) as the starting point.
16 But secondarily, we will -- we will take a reasoned
17 position. We want to do a little bit of research on
18 what the both discoverability of the number would be, as
19 well as whether or not it would be appropriate for you
20 to reach out to her.

21 MR. ZELMAN: Sure. Again --

22 MR. LEBLANC: I certainly can't -- I certainly
23 can't represent or say that I'm representing someone who
24 I haven't spoken with as a result of the claims at issue

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1 in the case.

2 MR. ZELMAN: I couldn't agree more. I'm just
3 saying that this is a witness identified in the initial
4 disclosures, and if I want to get ahold of this witness,
5 it's either through you as counsel or otherwise, I have
6 to find her. And --

7 MR. LEBLANC: Oh, you -- you -- and you can
8 certainly -- and you can certainly ask to get ahold of
9 her through me. I can -- I can -- as an employee of the
10 company, I'm happy to do -- I'm happy to facilitate
11 that, but --

12 MR. ZELMAN: Then that's fine.

13 BY MR. ZELMAN:

14 Q. All right. Now, Mr. Schneider, in the
15 discovery responses that we received in this case --
16 hang on. Let me pull it up. I don't want to misstate
17 it. One second.

18 In response to Interrogatory number 4, the
19 Defendant responded that it sold approximately 8 to 12
20 months -- I'm sorry, 8 to 12 vehicles per month from
21 March 15, 2019 until the Bridgewater location closed
22 in December 2021.

23 Does that number sound about right to you?

24 A. Yes.

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1 Q. All right. And that number was consistent
2 throughout this two-and-a-half (audio interruption)?

3 A. To the best of my memory.

4 THE REPORTER: Counsel, just -- it cut out.
5 But I just wanted to get your question was, it was
6 consistent throughout the two-and-a-half years,
7 correct?

8 MR. ZELMAN: Yes.

9 THE REPORTER: Okay. Thank you. And the
10 witness' answer was "Yes." Thank you.

11 THE WITNESS: Yes, to the best of my memory.

12 THE REPORTER: Yes. Thank you.

13 BY MR. ZELMAN:

14 Q. Okay. Going to do some quick math here, one
15 second. So there are 33 months in that time period
16 between March 2019 and December 2021.

17 Can we agree on that, or do you want to take a
18 moment to -- to calculate that?

19 A. I would have to think that if you did it, I
20 would have to agree with you. It sounds like pretty
21 simple math.

22 Q. Sure.

23 A. So I -- I would agree with you.

24 Q. Perfect. It's two years and nine months, so.

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1 A. Yes, right. Yeah.

2 Q. Okay. Using the number at the low range,
3 which was eight cars a month, that would be roughly 264
4 cars sold, and using the number at the high range, that
5 would be roughly 396 cars sold.

6 Does that range sound about right to you?

7 A. I'm not doing the math, but, you know, I -- I
8 can do the math for you, if you want me to.

9 Q. I just did the math. I'm just asking you if
10 --

11 A. His math is right. Okay. There you go.

12 Q. Okay.

13 A. Math is correct. There you go.

14 Q. But I'm saying that range of vehicles sold
15 sounds about what The Garage did in business until it
16 closed in December 2021?

17 A. Sounds close, I think.

18 Q. Okay.

19 A. I can't remember exactly.

20 Q. And Lauren was the only salesperson for the
21 Bridgewater location at that time, or were there other
22 salespeople?

23 A. I believe that we had another salesperson
24 years ago, and I don't remember -- I can't remember his

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1 name. He was there for a short period.

2 Q. Would you say that Lauren was the salesperson
3 for the vast majority of these deals?

4 MR. LEBLANC: Objection.

5 THE WITNESS: A vast majority, yes.

6 BY MR. ZELMAN:

7 Q. Now, The Garage would charge a documentary
8 preparation fee when selling these vehicles, correct?

9 A. Yes.

10 Q. That documentary preparation fee was posted on
11 a paper in the office somewhere?

12 MR. LEBLANC: Objection.

13 THE WITNESS: It was posted on the wall.

14 BY MR. ZELMAN:

15 Q. Where -- which wall?

16 A. The wall that was in front of the customer
17 seating position at the time.

18 Q. Okay. So I've been to dealerships, but
19 they're all different, obviously.

20 So when you walk into the dealership, I assume
21 you're walking into the showroom with vehicles?

22 A. No. We had a front door. You would walk in
23 through the front door. The desk was to the right-hand
24 side. It was very small office, and the customer would

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1 sit in front of the desk, and as they were facing the
2 wall that was behind them, there was a sign -- there
3 was signage on the wall right behind them, whereas
4 they -- they couldn't miss it. It was right there in
5 front of them.

6 Q. And there was a picture produced in this
7 action of that sign. Was that picture -- I'm sorry.

8 Was that picture taken of the sign at the
9 Bridgewater location or at the sign at another location?

10 A. At the Bridgewater location.

11 Q. When was that picture taken?

12 A. I don't know when it was taken, prior to us
13 closing.

14 Q. Why was that picture taken at that time?

15 A. I believe we were trying to get a price on
16 painting, and we found it in an old picture.

17 Q. Okay. So the doc fee is listed on a paper
18 that's hanging on the wall there, as you described it,
19 but when The Garage is advertising its vehicles for
20 sale online, it is not including that documentary
21 preparation fee in the advertised price of the vehicle?

22 MR. LEBLANC: Objection.

23 You can answer.

24 THE WITNESS: It always has.

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1 BY MR. ZELMAN:

2 Q. It always has what?

3 A. Listed the documentary preparation in its
4 advertisements, to the best of my knowledge.

5 Q. I'm not asking you if you're listing
6 something, saying, you know, taxes, title, doc fees
7 extra.

8 Is that what you're referring to?

9 A. The documentation fees have always been
10 advertised, to the best of my knowledge, in the
11 advertisements.

12 Q. Advertised how?

13 A. Stating that there's documentary fees, and
14 tax, and title, and things of such in -- in conjunction
15 with the purchase of the automobile.

16 Q. Okay. But my question is a little different.

17 When The Garage would advertise the price of
18 the vehicle, say this vehicle is being sold for \$10,000,
19 the documentary fee would not be rolled into that
20 price.

21 That would be an additional fee that would be
22 paid at the time of purchase, correct?

23 MR. LEBLANC: Objection.

24 THE WITNESS: The price of the car would be

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1 shown, and then it would -- it was a disclaimer that
2 states that the vehicle would have those charges on top
3 of that price.

4 BY MR. ZELMAN:

5 Q. And that was consistent throughout? That was
6 The Garage's practice?

7 A. Yeah, to the best of my memory.

8 Q. Okay. Were there also times that there was no
9 disclaimer at all regarding the additional doc fee?

10 A. I never inspected each ad personally, but to
11 the best of my understanding, they all had that.

12 MR. LEBLANC: And with no question pending,
13 let us take a five-minute break.

14 MR. ZELMAN: That's fine.

15 MR. LEBLANC: Thank you.

16 THE REPORTER: Hearing no objection, we'll go
17 off the record. The time is 10:26 a.m.

18 (A recess was taken.)

19 THE REPORTER: Standby. And we are back on
20 the record. Time is 10:34.

21 MR. ZELMAN: Thank you.

22 BY MR. ZELMAN:

23 Q. All right. I'm going to share my screen for
24 you, Mr. Schneider. Give me one second.

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1 A. Okay.

2 Q. Let me know when you can see it, please.

3 A. I see it.

4 Q. All right. And I'm showing you an
5 advertisement that was produced by my client in this
6 action. It's Bates stamped Barrett 001 and 002.

7 Do you recognize this photo, Mr. Schneider?

8 A. I do, yes. I recognize the car.

9 Q. All right. And this is a picture of the
10 advertisement as it appeared on
11 TheGarageBridgewater.com's website?

12 MR. LEBLANC: Objection.

13 THE WITNESS: I -- I don't remember looking at
14 it then.

15 BY MR. ZELMAN:

16 Q. Understood. But does this appear to be what
17 an advertisement on The Garage website would look like?

18 A. That is exactly what it reads, so yes.

19 Q. Okay. You have no reason to doubt that this
20 is --

21 A. Yeah. I don't doubt it, no. I see it, yes.

22 Q. Okay. Now, on the second page of this
23 advertisement, you have all the description of this
24 vehicle, it's specs over here. And then below that,

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1 you have the fine print, if you will.

2 Do you see that?

3 A. I -- I can see fine print. I can't read it
4 from here, but I see it, yes.

5 Q. That's fine. So the vehicle is being
6 advertised for sale at \$14,995, correct?

7 A. Yes.

8 Q. All right. But that does not include the
9 documentary preparation fee, which would be charged in
10 addition at the time of sale, correct?

11 A. Yes.

12 Q. And there is no mention of that documentary
13 preparation fee anywhere in this advertisement; isn't
14 that true?

15 A. I'm just reading it one more time and I don't
16 see it where it usually is.

17 Q. Why would that be?

18 A. I -- I don't know. I --

19 Q. That's it?

20 A. What was that?

21 Q. I didn't know if you were continuing with that
22 sentence or if you were --

23 A. No. I -- I don't know why it's not there.

24 Q. Okay. I'm just going to put another document

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1 up on the screen here.

2 THE REPORTER: Your mic is cutting out a
3 little bit, Counsel.

4 MR. ZELMAN: Okay. It's closer. Let me know
5 if that helps.

6 THE REPORTER: Yeah, much better.

7 BY MR. ZELMAN:

8 Q. All right. Let me know you can see this next
9 document on your screen, Mr. Schneider.

10 A. I see it.

11 Q. Okay. And this was produced as Barrett 15 and
12 Barrett 16. It's the same advertisement, just from an
13 earlier date.

14 Again, you don't see any mention of that
15 document preparation fee in any of the fine print here
16 either, do you?

17 A. No.

18 Q. And again, you have no reason to doubt that
19 this document is exactly what it purports to be, which
20 is an advertisement for the sale of the 2013 Audi Q5,
21 which is the subject of this action?

22 A. Yes.

23 Q. Okay. Now, how long have you -- I'm sorry. I
24 messed that up. Let me start again.

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1 How long have you been selling cars in the
2 Commonwealth of Massachusetts for?

3 MR. LEBLANC: Objection. Are you talking
4 about The Garage, who we're here to be deposed today?

5 BY MR. ZELMAN:

6 Q. How long has The Garage been in business for?

7 A. The garage is not in business anymore. How
8 long was The Garage Bridgewater in business for?

9 Q. Sure.

10 A. Five years, possibly, I think. I'm not
11 exactly sure of the dates, but I know it closed in --
12 in December of 2021.

13 Q. Okay. The other Garage locations, were they
14 open before that time?

15 MR. LEBLANC: Objection. Outside the scope.

16 BY MR. ZELMAN:

17 Q. Mr. Schneider?

18 A. Yes, they were.

19 Q. All right.

20 A. One of them.

21 Q. So --

22 A. Excuse me. One of them was and the other one
23 was not. The other one was opened after that.

24 Q. All right. So just -- I'm trying to figure

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1 out how long have you been in the business of selling
2 vehicles in the Commonwealth of Massachusetts for?

3 MR. LEBLANC: Objection. We're not here for
4 the individual deposition of Mr. Schneider.

5 You can answer.

6 THE WITNESS: For years.

7 BY MR. ZELMAN:

8 Q. More than 20 years?

9 A. About -- about that.

10 Q. Okay. Now, in owning and running a dealership
11 in the Commonwealth of Massachusetts, are you required
12 to keep up with the laws that apply to dealerships in
13 the Commonwealth?

14 MR. LEBLANC: Objection.

15 And I would instruct you not to answer, unless
16 you have personal knowledge. If the knowledge that you
17 would have obtained would have been through counsel, I
18 would instruct you not to answer.

19 BY MR. ZELMAN:

20 Q. Mr. LeBlanc -- I mean -- I'm sorry,
21 Mr. Schneider?

22 A. I -- I have been instructed not to answer.

23 MR. LEBLANC: Only if -- if -- you're
24 instructed not to answer if you learned or -- or you

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1 would have learned of the answer to that question from
2 counsel. If you have independent knowledge, you may go
3 ahead and answer.

4 THE WITNESS: So maybe you can please re-ask
5 the question.

6 BY MR. ZELMAN:

7 Q. The question was simply: Are you aware that
8 you have to comply with the laws that pertain to
9 dealerships when running a dealership in the
10 Commonwealth of Massachusetts? That's the question.

11 A. I -- I know that all businesses have laws that
12 they are supposed to -- that are required, yes.

13 Q. Okay. And you are aware that under
14 Massachusetts law, a documentary preparation fee cannot
15 be charged unless it is included in the advertised price
16 of the vehicle; is that true?

17 MR. LEBLANC: Objection.

18 If you would have learned that through
19 counsel, I'll instruct you not to answer it. To the
20 extent you would have independent knowledge of such,
21 you can answer it.

22 THE WITNESS: I -- I did -- I was not aware of
23 that.

24 BY MR. ZELMAN:

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1 Q. When did you become aware of that?

2 MR. LEBLANC: Objection. Calls for a legal
3 conclusion.

4 And answer his question of when you became
5 aware of it.

6 THE WITNESS: I don't remember exactly when I
7 became aware of that.

8 BY MR. ZELMAN:

9 Q. You became aware of it when -- well, let me
10 rephrase.

11 You were certainly aware of it once the
12 lawsuit was served and the law was cited in the
13 Complaint. Is that fair to say?

14 MR. LEBLANC: Objection.

15 You can answer.

16 THE WITNESS: Please state your question one
17 more time.

18 BY MR. ZELMAN:

19 Q. Sure. As of the date that the Complaint was
20 served on The Garage, you were certainly aware of the
21 law, as the law was stated in the Complaint.

22 Is that a fair statement?

23 A. Yes.

24 Q. Okay. Were you aware of that law prior to the

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1 Complaint being served on The Garage?

2 A. No.

3 Q. Okay. Now that you are aware of the law, does
4 the dealerships in Brockton and Whitman include the
5 documentary preparation fee in the advertised price of
6 the vehicle, or do they still tack it on at the time of
7 sale?

8 MR. LEBLANC: Objection. I'm going to
9 instruct him not to answer that question. If you want
10 to go to court on that, you can.

11 MR. ZELMAN: Okay. So let me just write that
12 down, and then we will.

13 And what is the basis for instructing the
14 witness not to answer?

15 MR. LEBLANC: You are asking a closed -- a
16 corporation that's been closed for three years to
17 testify about the practices and policies of separate
18 corporations. It's inappropriate. And at this point,
19 it is abusive and harassing to the process.

20 You're -- you're going on a fishing expedition
21 for other LLCs that are not at issue in this case.

22 MR. ZELMAN: Okay. We're a little over an
23 hour into this deposition. Frankly, we have not a
24 whole lot left.

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1 BY MR. ZELMAN:

2 Q. Mr. Schneider, do you feel that I've been rude
3 to you at any point in this deposition?

4 MR. LEBLANC: It's not about being rude,
5 Yitzchak. That's not what I said.

6 MR. ZELMAN: I understand. The question is
7 not for you, though.

8 THE WITNESS: No.

9 BY MR. ZELMAN:

10 Q. Have I been harassing or abusive towards you
11 during this deposition?

12 A. Some of the questions have been slightly out
13 of line.

14 Q. Which one's were those?

15 A. Asking about the other entities and asking
16 about a phone number, for a personal phone number.

17 MR. ZELMAN: All right. Let's see what else
18 we can get done during the deposition, and then we will
19 make the call. All right.

20 MR. LEBLANC: What -- no. No. Before we do
21 this, what's your basis for making a call today?
22 Because it will be an issue that can be briefed for the
23 Court. There's no emergency here, and I will agree on
24 the record that to the extent we submit written

1 submissions to the Court, that I will -- if the Court
2 agrees with you, I will certainly agree to produce the
3 witness to answer those questions.

4 I'm not, like, again, I'm saying that you're
5 well outside the scope of the 30(b)(6). And I think by
6 your own admission, that that would not be included
7 within the scope of the 30(b)(6), and that's what we're
8 here for today.

9 You're not entitled to go on a fishing
10 expedition during a -- during -- for other companies,
11 unrelated companies. And -- and I think there's no
12 emergent nature to this because I am offering to bring
13 the witness back to the extent there's an issue.

14 MR. ZELMAN: Right. But the problem with that
15 is it -- it flips the burden, if you will, right? It's
16 your burden to make a motion to limit or terminate the
17 deposition, should you feel that's required or
18 appropriate.

19 It's not my motion to go and compel answers to
20 questions at a deposition, which should have not been
21 instructed not to answer. So that's the issue, but
22 again, we can address that perhaps at the break or
23 else-wise.

24 MR. LEBLANC: Okay.

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1 BY MR. ZELMAN:

2 Q. Okay. Going back to the sale of the vehicle
3 to my client, Mr. Schneider. Yeah, let's -- let's
4 actually -- we'll pull up the -- the sale documents,
5 and we can go through it together. Give me one second.
6 I'll put it on the screen.

7 All right. Did that work?

8 A. Yes.

9 Q. All right. Awesome. Okay. Give me one
10 second.

11 Okay. The document on the screen in front of
12 you is GAR 1, and that is the motor vehicle purchase
13 contract for the Audi that was sold to my client by The
14 Garage.

15 Do you see that?

16 A. Yes.

17 Q. Okay. The price of the vehicle was \$14,700?

18 A. Yes.

19 Q. On top of that was charged \$949.31 in
20 Massachusetts sales tax?

21 A. That is for the -- the Department of -- the
22 registry, yes.

23 Q. There was a \$100 fee charge for title
24 preparation?

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1 A. For the Registry of Motor Vehicles, yes.
2 That's for the plates and things like that. The \$100, I
3 think, is for new plates and registration.

4 Q. Okay. There's a documentary preparation fee
5 of \$489?

6 A. Yes.

7 Q. Okay. What was that for?

8 A. For preparing all of the documents to go to
9 the registry, the bill of sale, the odometer form, the
10 warranty form, privacy letters. Also to make sure that
11 the vehicle got -- we paid for inspection stickers for
12 the -- for the customer at the inspection station.

13 We also take and check the vehicle to make
14 sure that it is okay, safety check. So it covers all of
15 those areas.

16 Q. And that's -- that's a fee that doesn't go to
17 the RMV, that goes to The Garage, correct?

18 A. Yes.

19 Q. All right. The total with all the fees and
20 the sales price is \$16,238.31?

21 A. That is correct.

22 Q. All right. My client provided a deposit of
23 \$11,500?

24 A. Yes.

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1 Q. All right. And then he had another \$4,738.31
2 due on delivery?

3 A. Yes.

4 Q. And he did pay that, correct?

5 A. Yes.

6 Q. Okay. And that documentary preparation fee
7 that was charged to my client, that was charged to all
8 of these customers at The Garage at the time of the
9 purchase of the -- of their vehicle, correct?

10 A. At The Garage Bridgewater location? Yes.

11 Q. Yes. Okay. In this action, there were some
12 advertisements that were produced by The Garage.

13 Do you remember looking those over?

14 A. I'm sorry. What is -- what are you asking me?
15 I don't understand.

16 Q. There were some advertisements produced by The
17 Garage. Do you recall that?

18 A. I would have to see those again.

19 Q. Sure. Let me put it up on the screen.

20 A. Okay.

21 Q. Okay. So I -- on the screen in front of you
22 is what's been Bates stamped as GAR 94. This looks like
23 the second page of the website advertisement, this time
24 for a 2014 Acura ILX?

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1 A. Yes.

2 Q. All right. How did The Garage go about
3 obtaining this? Was this from the way-back machine or
4 something else?

5 A. I believe it was in the folder of the
6 automobile.

7 Q. Which automobile?

8 A. The Acura ILX.

9 Q. Okay. Do you still have that folder?

10 A. I believe that I might have it. I don't know
11 for a fact.

12 Q. Why is it that you have the folder for the
13 Acura ILX, but not the folder for any of the other
14 vehicles?

15 A. When I went to retrieve Mr. Barrett's folder,
16 I grabbed a couple of folders at random. Probably the
17 "A" was at the beginning for Acura. I probably just
18 grabbed it to bring it with me.

19 I don't know why. I just happened to do it at
20 that point in time.

21 Q. How many other folders did you grab at that
22 time?

23 A. I don't recall. Maybe a couple. I'm not
24 exactly sure.

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1 Q. Do you still have them?

2 A. I am not sure if I still have them or not. I
3 -- I might still have a couple of folders, yes.

4 Q. Okay. Next was produced a number of e-mails
5 from Autotrader.

6 Do you see that?

7 MR. LEBLANC: Could you make it larger,
8 Yitzchak?

9 THE WITNESS: Yeah. Could you make it a
10 little larger, please?

11 MR. ZELMAN: Sure.

12 THE WITNESS: Thank you.

13 BY MR. ZELMAN:

14 Q. Is that better?

15 A. Yes.

16 Q. Do you -- do you recall The Garage Bridgewater
17 getting e-mails from Autotrader with regards to leads
18 for -- for purchasers who we are interested in
19 purchasing vehicles at the Bridgewater location?

20 A. I -- I know that leads did come in from
21 various advertising sources.

22 Q. Including Autotrader?

23 A. Yes.

24 Q. Okay. And this one is a different e-mail

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1 address, it's thegaragebridgewater@gmail.com?

2 A. I -- I can see the address. That's
3 thegaragebridgewater@gmail.com, yes.

4 Q. Is that an e-mail that was used by Lauren or
5 someone else at The Garage Bridgewater?

6 A. Can only assume it was, yes. Through the web
7 provider. Through the Autotrader.

8 Q. All right. And how did -- well, let me ask
9 you like this. Someone went through those e-mails in
10 order to produce them for this case, correct?

11 A. I don't know where the ad -- I don't know
12 where it was from, if it was from a folder. I don't
13 know.

14 Q. All right. So that -- you didn't go to that
15 e-mail and pull up these Autotrader e-mails?

16 A. No.

17 Q. Do you think it could have been from the
18 folder of this 2012 Ford Escape?

19 A. I -- I don't remember.

20 Q. Do you think Lauren would have done this?

21 A. I don't know. I -- I have -- I don't know. I
22 don't -- I don't know how -- I don't -- I don't
23 remember.

24 Q. Well, if it wasn't you and it wasn't Lauren,

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1 who could it be?

2 A. I -- I can't answer that. I don't know.

3 Q. By the policy of charging this documentary
4 preparation fee at the time of sale, was that policy
5 changed at any point during the time period of March
6 2019 through December 2021?

7 A. No.

8 Q. And the policy for advertising the price of
9 the vehicles being sold, but not including the
10 documentary preparation fee in the amount of the
11 vehicle sale price, did that policy change during the
12 time period of March 2019 through December 2021?

13 MR. LEBLANC: Objection.

14 You can answer.

15 THE WITNESS: My policy has always been the
16 same --

17 BY MR. ZELMAN:

18 Q. Okay.

19 A. -- in The Garage (audio interruption).

20 THE REPORTER: The -- the last part of the
21 answer got cut off. Was the -- was the witness saying
22 my policy has always been the same in The Garage
23 Bridgewater?

24 THE WITNESS: Yes.

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1 THE REPORTER: Okay. Thank you. Just wanted
2 to make sure that last word was correct.

3 BY MR. ZELMAN:

4 Q. Are you aware of the interactions that
5 Ms. Silver, or anybody else at The Garage, had with
6 Mr. Barrett at the time of the sale of the vehicle?

7 A. Not at the time of the sale.

8 Q. I mean, I know you said you spoke to
9 Ms. Silver and she mentioned that Mr. Barrett was a good
10 negotiator, but other than that, did she tell you
11 anything about what occurred at the time of the sale or
12 leading up to the time of the sale?

13 A. Only after I received the Complaint.

14 Q. And what did she tell you, other than what
15 we've discussed already today?

16 A. That he was very clear and understood exactly
17 what the documentation fee was; that they did have a
18 very clear trail of discussion; and that he was given a
19 discounted portion of the documentation fee because he
20 had asked for that; and that is why we discounted the
21 price she told me from 14995 to 14,7.

22 I guess she negotiated to give him half of the
23 documentation fee, as, kind of, of what he was aware of.
24 She also said that he, you know, had all of the

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1 documentation to bring to his finance -- the bank that
2 financed him prior to the deal being consummated.

3 Q. The contract that we looked at earlier, the
4 documented preparation fee is still listed as \$489, but
5 the sale price of the vehicle was discounted by about
6 \$295; is that right?

7 A. Yes.

8 Q. Okay. Why didn't Ms. Silver just discount the
9 document preparation fee, if that's what she was trying
10 to do, in fact?

11 MR. LEBLANC: Objection.

12 You can answer.

13 THE WITNESS: Because everybody pays the same
14 documentation fee.

15 BY MR. ZELMAN:

16 Q. And is it also a common practice in selling
17 vehicles that people come in and try and negotiate the
18 price of the vehicle by a couple of bucks?

19 A. Everybody tries to save as much as they can
20 when purchasing.

21 Q. Sure. When The Garage Bridgewater was open,
22 did you use any sale software, such as LeasingDesk or
23 Autotrader, or anything like that?

24 A. We -- we used Autotrader.

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1 Q. Okay. Do you still use Autotrader?

2 A. I --

3 MR. LEBLANC: Objection.

4 THE WITNESS: The business has been closed, so
5 we no longer use that.

6 BY MR. ZELMAN:

7 Q. I understand the Bridgewater location is
8 closed. At the other location, do you still use
9 Autotrader?

10 MR. LEBLANC: Objection.

11 You can answer.

12 THE WITNESS: I -- I believe we use
13 Autotrader. I can't remember to be exactly, a couple
14 of different sources.

15 BY MR. ZELMAN:

16 Q. Have you checked Autotrader to see if you have
17 records relating to the sale of vehicles that were done
18 at The Garage Bridgewater location?

19 A. I'm sorry? Say it again. I couldn't -- you
20 broke up a little bit.

21 Q. Have you checked the Autotrader software to
22 see if it still has any records relating to sales of
23 vehicles from The Garage Bridgewater location?

24 A. No.

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1 Q. Why not?

2 A. I just haven't done that. I no longer have
3 websites up. It's a closed business. No more leads
4 are being generated for years.

5 Q. Did you use any other sort of dealership
6 management software while The Garage Bridgewater was
7 open, such as AutoRaptor and AutoManager, anything like
8 that?

9 A. We -- we had -- yes. And I'm trying -- I -- I
10 can't remember the name of it, but I -- I know we had a
11 -- I know we had a service there. I just don't remember
12 the exact name of it.

13 Q. Okay. Who -- who would remember that? Would
14 that be Lauren?

15 A. I --

16 MR. LEBLANC: Objection.

17 You can answer.

18 THE WITNESS: Yeah. I -- she would probably
19 remember that.

20 BY MR. ZELMAN:

21 Q. (Audio interruption) whichever one it was --

22 THE REPORTER: Sorry, counsel, could you
23 start --

24 MR. LEBLANC: Start your question. You broke

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1 up completely at the beginning.

2 BY MR. ZELMAN:

3 Q. My apologies. If you were to access that
4 software, whatever software it is, you'd be able to see
5 the records of the vehicles that were sold at The Garage
6 back before it closed? And again, I'm referring to the
7 Bridgewater location.

8 MR. LEBLANC: Objection.

9 You can answer.

10 THE WITNESS: I don't know.

11 BY MR. ZELMAN:

12 Q. And that's because you haven't tried to look?

13 A. Yes.

14 MR. ZELMAN: Looking through my list of
15 questions here to see what I still have for you. Give
16 me a moment.

17 MR. LEBLANC: You want us to take a few-minute
18 break so you can do that?

19 MR. ZELMAN: We can do it either way. Just I
20 want to --

21 MR. LEBLANC: I know you want to have a
22 discussion about the other question that's outstanding,
23 and I'd like to talk to my client about it so.

24 MR. ZELMAN: Sure. Why don't we take five

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1 minutes, come back at 11:15 or so. Just, I'm wrapping
2 up anyway.

3 MR. LEBLANC: Great. Sounds --

4 THE REPORTER: Hearing no objection, we'll go
5 off the record. Time is going on 11:11 a.m.

6 (A recess was taken.)

7 THE REPORTER: We are back on the record.
8 Time is 11:22 a.m.

9 MR. LEBLANC: So before going back or going
10 back to Attorney Zelman's questions, I've had the
11 opportunity to talk with my client about the two kind
12 of outstanding issues in the deposition.

13 The first being Lauren Silver, and I've
14 offered Attorney Zelman the piece of information that I
15 will be representing her as an employee of The Garage
16 Bridgewater. Thus, any contact that he intends to make
17 should be done through me.

18 And second, with regard to the question about
19 the two nonparty entities and their policy relating to
20 documentary preparation fees and advertisements, I will
21 allow the witness to answer that single question, with
22 the reservation that we won't allow further questions
23 for unrelated unnamed entities.

24 The witness -- he clearly was not

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1 contemplated, those topics were clearly not contemplated
2 in the 30(b)(6), and the witness wasn't prepared to
3 testify to them.

4 Given the fact that we have that one question
5 pending, and in an effort to act in the spirit of
6 cooperation as discovery requires us to, I will allow
7 the witness to answer that one question, but given the
8 position any further questions, we will view as further
9 harassment. So we're going to ask that it be limited to
10 that one question.

11 MR. ZELMAN: Okay.

12 BY MR. ZELMAN:

13 Q. So let's just get that out of the way then.

14 Mr. Schneider, do you know the answer to that
15 question?

16 A. Yes, I do.

17 Q. And what is the answer?

18 A. The answer is that the advertisements have a
19 disclosure at the end of each of them explaining how the
20 fees are charged.

21 Q. So the same type of disclaimer we saw earlier
22 on the advertisements today?

23 A. Yes.

24 Q. Okay. Let me go back here.

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1 MR. LEBLANC: And we did offer -- Attorney
2 Zelman, there is a correction for the question --

3 BY MR. ZELMAN:

4 Q. Oh, yeah. You had a correction to the
5 software -- a correction to the software question I had
6 asked you before the break?

7 A. Yes.

8 Q. What was -- what's your correction?

9 A. I have reached out to our provider for the
10 automobile billing that we've done through there, and
11 he no longer has any records of any of the deals that
12 were put through the Bridgewater location.

13 Q. Which provider is that?

14 A. CARPRO.

15 Q. CARPRO?

16 A. Yes.

17 Q. Now, in response to our request for
18 production, there were supplemental responses served
19 where we asked for records reflecting documentary
20 preparation fees that were paid by these customers or
21 that were obtained by the Defendant within the relevant
22 time period.

23 And the supplemental response to that request
24 was that there are three documents that are being

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1 withheld from the production at this time.

2 Do you know what those three documents are?

3 A. I'm not understanding the question.

4 Q. Sure. Let me share my screen. In response to
5 Plaintiff's request for production of documents, there
6 was a number of supplemental responses served where the
7 Defendant responded that it's withholding three
8 documents because, "the Court has not certified
9 Plaintiff's proposed class and the production of these
10 documents would result in disclosure of personal
11 identifying information for putative class members
12 prior to a ruling on class certification in Plaintiff's
13 favor."

14 Do you know what those three documents that
15 are --

16 MR. LEBLANC: Objection.

17 To the extent you only would have learned of
18 the identification of the three documents through
19 counsel, I would instruct you not to answer.

20 BY MR. ZELMAN:

21 Q. Mr. Schneider?

22 MR. LEBLANC: I'm instructing him not to
23 answer. Objections and withholding documents from
24 discovery are in the purview of the lawyer.

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1 MR. ZELMAN: Okay. So I guess we will need to
2 confer on that after this.

3 All right. So that's all my questions for you
4 today, Mr. Schneider.

5 Unless it opens anything up for you, Mr.
6 LeBlanc, then you'll be free to go.

7 MR. LEBLANC: I have no questions at this
8 time.

9 MR. ZELMAN: Okay. Then thank you for your
10 time, Mr. Schneider.

11 THE WITNESS: Thank you.

12 THE REPORTER: Thank you. All right. Before
13 -- prior to closing out this record, I'll just secure
14 transcript orders.

15 Mr. Zelman, will you be ordering today's
16 transcript?

17 MR. ZELMAN: Yes.

18 THE REPORTER: And is ten business days --

19 MR. ZELMAN: Electronic only.

20 THE REPORTER: -- sufficient? I'm sorry?

21 MR. ZELMAN: Electronic only.

22 THE REPORTER: Yes. And ten business days is
23 okay?

24 MR. ZELMAN: For now. I may speed that up.

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1 We're going to --

2 THE REPORTER: Okay.

3 MR. ZELMAN: I'm going to talk to Mr. LeBlanc
4 after this, anyway.

5 THE REPORTER: All right. If that's the case,
6 just reach out to Esquire, then.

7 And then for Mr. LeBlanc, I'll assume you'll
8 be ordering a copy. As you said, the witness will be
9 wanting the 30 days to read and sign.

10 Is that the case?

11 MR. LEBLANC: Correct.

12 THE REPORTER: Okay.

13 MR. LEBLANC: Electronic -- electronic only is
14 fine.

15 THE REPORTER: Electronic only. And would you
16 prefer the read and sign be sent to you or to the
17 witness directly?

18 MR. LEBLANC: Please send it to me.

19 THE REPORTER: Understood. And that is
20 everything from my end. We will close out this record.
21 Time is just past 11:29 a.m.

22 MR. ZELMAN: Thank you.

23 (The deposition concluded at 11:29 a.m.)
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CERTIFICATE OF REPORTER

I, Shayne Colomy, a Digital Reporter and
Notary Public in and for the State of New Jersey, do
hereby certify:

That the foregoing witness was not sworn;
that the proceeding took place before me at the time
and place herein set forth; that the testimony and
proceedings were accurately captured with annotations
by me during the proceeding.

I further certify that I am not related to
any of the parties to this action by blood or marriage
and that I am not interested in the outcome of this
matter, financial or otherwise.

IN WITNESS THEREOF, I have hereunto set my
hand this 18th day of June, 2024.

Shayne Colomy

Shayne Colomy
Notary Commission New Jersey No. 50205784
Commission Expires: January 15, 2028

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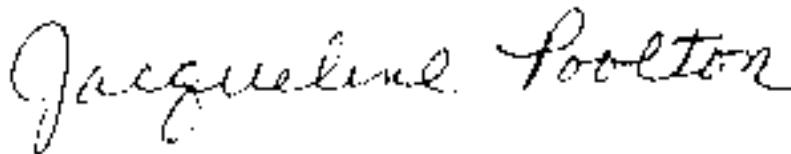
CERTIFICATE OF TRANSCRIPTIONIST

I, Jacqueline Poolton, Certified Shorthand Reporter/Registered Professional Reporter, do hereby certify:

That the foregoing is a complete and true transcription of the original digital audio recording of the testimony and proceedings captured in the above-entitled matter. As the transcriptionist, I have reviewed and transcribed the entirety of the original digital audio recording of the proceeding to ensure a verbatim record to the best of my ability.

I further certify that I am neither attorney for nor a relative or employee of any of the parties to the action; further, that I am not a relative or employee of any attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this matter.

IN WITNESS THEREOF, I have hereunto set my hand this 20th day of June, 2024.



Jacqueline Poolton, CSR/RPR

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DEPOSITION ERRATA SHEET

Assignment No. J11353638

Case Caption: MICHAEL BARRETT, ON BEHALF OF HIMSELF AND
ALL OTHERS SIMILARLY SITUATED vs. THE GARAGE CARS, LLC
D/B/A THE GARAGE

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have
read the entire transcript of my deposition taken in
the above-captioned matter or the same has been read
to me, and the same is true and accurate, save and
except for changes and/or corrections, if any, as
indicated by me on the DEPOSITION ERRATA SHEET
hereof, with the understanding that I offer these
changes as if still under oath.

Signed on the _____ day of _____,
2024.

ERIC SCHNEIDER

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